



3. The Defendant is entitled to removal of the aforesaid action to this Court because complete diversity of citizenship exists between Plaintiff and Defendant and the amount in the controversy exceeds the jurisdictional amount required by 28 U.S.C. § 1332.

4. This action was commenced by service of the Second Amended Summons and Complaint, attached hereto as **Exhibit A**. The Complaint did not contain a monetary amount of damages or the relief sought. Pursuant to 28 U.S.C. § 1446(b)(3), and Plaintiff's counsel has informed the undersigned he will not stipulate the damages are less than \$75,000.00. This Notice of Removal is filed within thirty (30) days of service upon Defendant of the initial pleadings setting forth the claim upon which relief is requested. Defendants will serve an Answer or responsive pleading as provided by law through this Court and in accordance with the applicable Federal Rules of Civil Procedure and Local Civil Rules.

5. The Honorable Melissa C. Burton, Clerk of Court of Oconee County, has been provided a copy of this Notice of Removal.

WHEREFORE, Defendant gives notice that the aforesaid action is removed from the Circuit Court of Oconee County, State of South Carolina, and to this Court for trial and determination.

MCANGUS GOUDELOCK & COURIE, L.L.C.

*s/J. Adam Ribock*

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